Appendix H

Areas of Critical Environmental Concern Relevance and Importance Rationale

APPENDIX H

2 AREAS OF CRITICAL ENVIRONMENTAL CONCERN

RELEVANCE AND IMPORTANCE RATIONALE

4 5	NW CO Sage Grouse EIS Audubon ACEC Proposal		
6	Relevance and Importance Rationale		
7	August 10, 2012		
8	Participants:		
9	Delissa Minnick Erin Jones		
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11	Megan McGuire Desa Ausmus		
12	Lisa Belmonte		
13 14	A. Relevance. An area meets the "relevance" criterion if it contains one or more of the following:		
15	I. A significant historic, cultural, or scenic value (including but		
16	not limited to rare or sensitive archeological resources and		
17	religious or cultural resources important to Native		
18	Americans).		
19	No, the proposed ACEC does not meet this criterion.		
20	2. A fish and wildlife resource (including but not limited to		
21	habitat for endangered, sensitive, or threatened species, or		
22	habitat essential for maintaining species diversity).		
23	Yes, the proposed ACEC meets this criterion. The GRSG is a candidate		
24	species under the ESA and is a BLM sensitive species, as well as a state		
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l 2	species of special concern in Colorado. The preliminary priority habitat has been delineated by the state wildlife agency, CPW.
3 4 5 6	3. A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities that are terrestrial, aquatic, or riparian; or rare geological features).
7 8 9	No, the proposed ACEC does not meet this criterion. The ecosystem encompassed by the PPH (sagebrush ecosystem) is not unique in Colorado or in the western US.
10 11 12 13 14	4. Natural hazards (including but not limited to areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by human action may meet the relevance criteria if it is determined through the resource management planning process that it has become part of a natural process.
16	No, the proposed ACEC does not meet this criterion.
17 E 18 19 20	B. Importance . The value, resource, system, process, or hazard described above must have substantial significance and values in order to satisfy the "importance" criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:
2 I 2 2 2 3	I. Has more than locally significant qualities that give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.
24 25 26 27 28 29 30 31	Yes, the proposed ACEC meets this criterion. The PPH that is found in Colorado is not considered more than locally significant. When the Colorado PPH is compared to the entire acreage of PPH as a whole, the Colorado piece is a very small part. However, the PPH does have special worth and does give the BLM cause for concern. The Colorado portion of PPH has special worth in that is the southeastern most edge of the range of GRSG. When land uses such as oil and gas development and rights-of-way are factored into the equation, the PPH becomes even more important for the protection of GRSG.
33 34 35	2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.
36 37 38	Yes, the proposed ACEC meets this criterion. The sagebrush ecosystem found in the PPH is not considered a rare resource in Colorado, or throughout the western US. However, the PPH in Colorado is

Ι considered a fragile ecosystem that has been identified by CPW as very 2 important for GRSG. It contains habitat that is valuable for all life stages, 3 including lekking, brood-rearing, and winter range. GRSG and their 4 habitats are vulnerable to adverse change. 5 3. Has been recognized as warranting protection in order to 6 satisfy national priority concerns or to carry out the mandates 7 of FLPMA. 8 Yes, the lands in the proposed ACEC meet this criterion. The GRSG 9 land use planning process has been identified as a national priority 10 concern. The BLM Washington Office issued two instructional memorandums, Instruction Memorandum 2012-043 and Instruction П 12 Memorandum 2012-044, to help guide the BLM through its land use 13 planning processes across each state, and to identify these processes as 14 a national priority. 15 4. Has qualities which warrant highlighting in order to satisfy public or management concerns about safety and public 16 17 welfare. 18 No, the proposed ACEC does not meet this criterion. 19 5. Poses a significant threat to human life and safety or to 20 property. 21 No, the proposed ACEC does not meet this criterion. 22

ı **NW CO Sage Grouse EIS** 2 **Preliminary General Habitat and Linkage Areas** 3 **Relevance and Importance Rationale** March 20, 2013 4 5 **Participants:** Bridget Clayton 6 Erin Jones 7 Sylvia Ringer Heidi Plank 8 Megan McGuire Desa Ausmus 9 Lisa Belmonte Robert Skorkowsky 10 A. Relevance. An area meets the "relevance" criterion if it contains one or П more of the following: 12 I. A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and 13 religious or cultural resources important to Native 14 Americans). 15 16 This criterion is not applicable to this proposal. 17 2. A fish and wildlife resource (including but not limited to habitat for endangered, sensitive, or threatened species, or 18 habitat essential for maintaining species diversity). 19 20 Yes, PGH and linkage areas do contain habitat for GRSG, which is a 21 candidate species for listing under the ESA. 22 3. A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, 23 endemic, or relic plants or plant communities that are 24 25 terrestrial, aquatic, or riparian; or rare geological features). No, the PGH and linkage areas do not meet this criterion. The 26 27 ecosystem encompassed by the PGH and linkage areas (sagebrush ecosystem) is not unique in Colorado or in the western US. 28 29 4. Natural hazards (including but not limited to areas of 30 avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous cliffs). A hazard caused by 31 human action may meet the relevance criteria if it is 32 33 determined through the resource management planning 34 process that it has become part of a natural process. 35 This criterion is not applicable to this proposal.

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- **B.** Importance. The value, resource, system, process, or hazard described above must have substantial significance and values in order to satisfy the "importance" criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:
 - I. Has more than locally significant qualities that give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.

The PGH and linkage areas do not have special worth, consequence, meaning, distinctiveness, or cause for concern, compared to any similar resource. They do not contain essential habitat, and according to the CPW website¹ description of the linkage habitat, "These linkages should be considered only as **potential areas** for movements between populations." Overall, the PGH and linkage areas that are found in Colorado are not considered more than locally significant. When the Colorado PGH and linkage areas are compared to GRSG habitat as a whole, the Colorado piece is a very small part and does not have more than locally significant qualities.

2. Has a quality or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.

The linkage areas and PGH are not unique, fragile, sensitive, rare, irreplaceable, exemplary, endangered, threatened, or vulnerable to adverse change. The linkage areas would provide habitat that would facilitate genetic flow between populations, but there is no data to suggest that these are the only areas that would facilitate genetic flow between populations in Northwest Colorado. According to the CPW website¹ description of the linkage habitat, "These linkages should be considered only as **potential areas** for movements between populations." Other areas that are not designated as linkage areas could also facilitate genetic flow between populations. Habitat qualities in the linkage areas and PGH have not been found support persistent use or sustain life functions of GRSG to the degree that PPH has been.

3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA.

The GRSG land use planning process has been identified as a national priority concern. The BLM Washington Office issued two instructional memorandums, Instruction Memorandum 2012-043 and Instruction

[\]frac{\text{http://wildlife.state.co.us/SiteCollectionDocuments/DOW/Maps/WildlifeSpecies/Birds/GrSG_PPH_PGH_20120309_Final.pdf}

Memorandum 2012-044, to help guide the BLM through its land use ı 2 planning processes across each state, and to identify these processes as 3 a national priority. However, the lands in PGH and linkage areas contain 4 habitats that have not been identified in the NTT report (NTT 2011) as 5 essential for breeding and should be considered as areas with generally 6 lower activity as well as potential areas for movement between 7 populations. Therefore, the PGH and linkage areas do not meet this 8 criterion. 9 4. Has qualities which warrant highlighting in order to satisfy 10 public or management concerns about safety and public П welfare. 12 This criterion is not applicable to this proposal. 13 5. Poses a significant threat to human life and safety or to 14 property.

This criterion is not applicable to this proposal.

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